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**MONTHLY PROGRESS REPORT FOR PERIOD
ENDING MARCH 31, 1988**

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ENCLOSURE**

MONTHLY PROGRESS REPORT FOR PERIOD ENDING MARCH 31, 1988**SUMMARY**

Progressive actions associated with the Federal Facilities Compliance Agreement (FFCA) continued during the month of March, 1988. Highlights of work completed this month, and a separate listing of ongoing actions are shown below.

The FMPC Waste Characterization Report was issued to USEPA on March 31, 1988. The Characterization Report was prepared in response to Item A.1 of the RCRA section of the FFCA.

The RI/FS Work Plan Revision 3 and supporting documents were transmitted to USEPA on March 31, 1988. The Work Plan Revision 3 incorporates responses to EPA comments on the RI/FS Work Plan and minor consistency changes identified by FMPC personnel during internal reviews of the document.

By the end of March, FMPC completed the installation of sixty-two monitoring wells. Twelve new wells were completed during the reporting period. In addition, development was completed at eleven well locations during March.

The FMPC Quarterly Report of Radiation Discharge Information, which covers the period October, 1987 through December, 1987, was transmitted to USEPA on March 18, 1988. The Quarterly Report of Airborne Emissions, which covers the period of October 2, 1987 through January 4, 1988 was transmitted to USEPA on March 18, 1988.

In addition to the above quarterly reports, the results of the ten (10) stack tests performed during FY1987 were also transmitted to USEPA on March 18, 1988.

The seventh monthly RI/FS technical progress report was transmitted to the USEPA on March 18, 1988.

INTRODUCTION

As an integral part of the agreement between the U. S. Department of Energy (US DOE) and the USEPA signed on July 18, 1986, monthly reports are provided by US DOE to USEPA regarding the progress made to meet the provisions of that agreement. This report fulfills that requirement by describing actions undertaken at the Feed Materials Production Center (FMPC) during the period March 1 through March 31, 1988.

WORK ASSIGNMENTS AND PROGRESS

The status of ongoing and completed work in support of the FFCA is summarized in Table 1. Additional descriptions of the work being performed and progress on these tasks are presented in the following sections. In both this portion of the monthly report, and in Table 1 (attached) descriptions of actions are presented in a format similar to that of the FFCA.

- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

- 1. Interim Remedial Measures

- Sections 1.A & 1.B

- FMPC Standard Operating Procedures are currently in the process of being revised to address EPA comments received on the 60-day deliverable submitted in response to Item 1.A of the CERCLA section of the FFCA.

- Section 1.C

- The K-65 Interim Stabilization Completion Report is currently undergoing internal review at the FMPC. The report is anticipated to be transmitted to USEPA in May, 1988. The Completion Report describes FMPC activities associated with the installation of a layer of insulating foam on top of the K-65 Silos.

- The FMPC has prepared an Invitation for Bid (IFB) for the installation of foam in the interior of the K-65 Silos. Due to some engineering design concerns, issuance of the IFB to qualified contractors has been delayed. The original design is currently under review by industry representatives. Comments from industry, which are due in April, will be incorporated into the IFB prior to issuance. The FMPC anticipates issuance of the IFB in May, 1988. An update of the internal foaming project will be conducted at the April 5, 1988 Technical Information Exchange (TIE) meeting at the FMPC. Potential scheduler impacts due to the design concerns will be discussed in the TIE meeting.

- A meeting was held between USEPA and FMPC personnel on March 28, 1988 in Chicago, Illinois to review EPA comments on the Technical Summary and the Environmental Assessment prepared to support the repackaging of thorium materials contained in the bins and silo at the FMPC Plant 8. Comments were tentatively resolved during that meeting and at a subsequent meeting with USEPA conducted on April 5, following the TIE meeting. Formal responses to the EPA comments will be transmitted to USEPA during April, 1988. Construction activities on this project will be initiated within two weeks of receipt of the USEPA approval of the Technical Summary.

- Progressive actions continued on the FMPC project to overpack the warehoused thorium materials. NEPA documentation to support the

repackaging of the initial two hundred twelve (212) containers is currently undergoing internal review at the FMPC. The project to repackage these 212 containers is on-schedule for initiation in June, 1988.

Engineering efforts continue for overpacking the 13,300 containers of warehoused thorium materials. A contract was issued by the FMPC for the completion of the necessary NEPA documentation and a risk analysis to support this work activity.

A Thorium Disposition Plan is currently under review at the FMPC. The Disposition Plan addresses the interim onsite storage of thorium bearing materials at the FMPC following the repackaging and overpacking efforts. The Plan is anticipated to be issued in April, 1988.

2. Remedial Investigation/Feasibility Study (RI/FS)

Section 2.A to 2.D

Work on these sections is complete.

Section 2.E

The Work Plan Revision 3 and supporting documents were transmitted to USEPA on March 31, 1988. The Work Plan Revision 3 incorporates necessary revisions resultant from EPA comments received to date on the RI/FS Work Plan. Also, Revision 3 incorporates minor consistency changes identified by FMPC personnel during an indepth review of the Work Plan Revision 2.

On March 4, 1988, the FMPC received a correspondence from USEPA-Region 5 requesting clarification on the RI/FS Health and Safety action levels requiring increased levels of personnel protection. The FMPC issued a response to USEPA on March 17, 1988.

Section 2.F

By the end of March, the FMPC completed the installation of sixty-two (62) groundwater monitoring wells. Twelve new wells (344, 176, 172, 244, 177, 130, 135, 208, 334, 210, 108 and 315) were completed during the reporting period. During March, 870.5 lineal feet of drilling was completed.

Wells are currently being installed at locations 244, 154 and 215. The twelve wells installed during March were completed in accordance with the protocols defined within the RI/FS Work Plan Revision 3.

Monitoring well development was completed on eleven (11) wells during March. Final turbidity levels below 5 NTU could not be attained at three of these well locations (266, 109, and 343). A sample of development water from well 184 was collected and transferred to IT Laboratories in Oak Ridge for analyses for the

HSL plus listing. Analytical results will be transmitted to USEPA in April, 1988.

Surface radiological surveys continued during the reporting period. To date, 408 complete grids have been surveyed with SPA-3 and FIDLER detection systems. The Ultra Sonic Ranging and Data System (USRADS) was acquired from Oak Ridge National Laboratory on March 28, 1988. The USRAD system will be integrated into the RI/FS Radiation Measurement Program during April.

During operations at well location 173, between waste storage pits 1 and 3, the residues from pit 3 were contacted by the drill rig. Drilling commenced to a depth of 28 feet at which time operations were halted and the boring grouted to the surface with Volclay. Further attempts to locate wells 173 and 175 on the berm between the waste storage pits will be completed during April, 1988.

During construction activities at a location in the north east portion of the FMPC production area, a quantity of buried low level radioactive materials was encountered. After contacting the materials, further construction activities were placed in abeyance and the area roped off. Characterization activities were immediately initiated by the FMPC to determine the nature and extent of the buried material. An update on this characterization will be presented at the April TIE meeting.

Volume 3 of the Characterization Investigation Study final report was transmitted to USEPA on March 7, 1988. Volume 3 presents the results of the detailed radiological survey of the surface soils in the FMPC waste storage area.

Section 2.G to 2.L

Work has not yet begun on these items.

3. Reports and Record Keeping

Section 3.B

The seventh RI/FS monthly technical progress report was transmitted to USEPA on March 18, 1988. The eighth monthly technical progress report will be transmitted during the month of April.

° Clean Air Act (CAA)

Section B - Items 1 through 4

The FMPC deliverable addressing Section B - Items 1 through 4 of the Clean Air Act Section of the FFCA was transmitted to USEPA in August 1986.

A May 12, 1987 letter from William D. Franz to James A. Reafsnnyder stated that the FMPC air monitoring network should be reevaluated for its ability to measure representative concentrations of air pollutants. An evaluation of the FMPC air monitoring network was performed in December, 1986. Mr. Franz's concerns on the location

of air monitoring station No. 6 were addressed during the joint OEPA/USEPA inspection on July 14-17, 1987. Actions are currently underway to modify existing monitoring stations to meet EPA siting criteria. Modifications of the monitoring stations will be completed by May 2, 1988.

The FMPC annual progress report addressing the Clean Air Act Section of the FFCA on the replacement of air pollution control devices was submitted to USEPA on April 4, 1988.

Section C

Under the FFCA, DOE will comply with the reporting provisions contained in 40 CFR 61.94 (c). Under these provisions, the DOE is required to, by June 1 annually, submit a report which includes the results of monitoring emissions from points subject to 40 CFR 61 Sub-part H and their associated dose calculations. The annual report for calendar year 1986 emissions was provided to EPA in 1987, in accordance with the requirements of 40 CFR 61.94 (c). The annual report for calendar year 1987 is due for transmittal to EPA by June 1, 1988.

Section D.1 & D.2

The yearly particulate stack testing schedule for FY-88 was transmitted to EPA on December 31, 1987. The results of the FY-87 stack tests are complete. The ten (10) particulate stack test reports for 1987, including radiological results, were transmitted to USEPA on March 18, 1988.

Stack tests have been completed on three FMPC emission points during FY1988. Samples collected during these tests are currently undergoing analysis at Weston Analytics. Results of these tests will be transmitted to USEPA as they become available.

Section E.2

The fifth Quarterly Particulate Emission Report covering the period from October 2 through January 4, 1988 was transmitted to EPA on March 18, 1988.

Sections F and G

Work on these sections is complete.

° Resource Conservation and Recovery Act (RCRA)

Sections A and B - Items A.1 through A.7 and Items B.1 through B.5

USEPA - Region V provided comments on Sections A and B in December 1986. Both Sections were revised to reflect USEPA comments. The revised Section A was transmitted to the USEPA on January 23, 1987. The revised Section B was transmitted to the USEPA on January 28 1987.

A May 12, 1987 letter from William D. Franz to James A. Reafsnyder provided a second round of USEPA comments on these revised FFCA deliverables. The FMPC response to these comments is currently undergoing internal review and is anticipated to be transmitted to USEPA in April.

Section C.1

Work on this item is complete.

- Radiation Discharge Information

Section A with Items A.1, A.2, and A.3

The FMPC off-site environmental monitoring program and the associated quality assurance plan were provided to USEPA in August 1986. A May 12, 1987 letter from William D. Franz to James A. Reafsnyder provided USEPA comments on these documents.

Five Quarterly Liquid Discharge Reports have been transmitted to EPA thus far. The fifth Quarterly Liquid Discharge Report for the period from October through December, 1987 was transmitted to USEPA on March 18, 1988.

TABLE 1.

STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF 31-Mar-88			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
CERCLA ACTIONS			
1	INTERIM REMEDIAL MEASURES		
1.A.	Develop and implement O&M procedures and work practices to control radioactive emissions, including radon gas and decay products.	60 days	Complete. Comments were received from U.S. EPA on June 2, 1987. A comment response was transmitted to U.S. EPA on July 10, 1987. SOPs in process of being revised.
1.B.	Develop and provide to EPA a plan and implementation schedule for the control of radon at the K-65 silos.	30 days	Revised deliverable was transmitted to EPA on January 23, 1987. Second set of comments on original August 17, 1986 submittal received June 17, 1987. A comment response was transmitted to U.S. EPA on July 10, 1987.
	Develop & provide to EPA a plan & implementation schedule for control of thorium compounds.		This schedule was provided to US EPA in the revised deliverable transmitted on January 23, 1987. Updates of thorium repackaging activities were presented to the USEPA during the February TIE meeting.
1.C.	Implement radon control plan approved by the EPA.	----	Phase I of K-65 interim remedial action is complete. Phase II design under review by industry representatives. An update of Phase II efforts will be presented in the April TIE meeting.
	Implement interim control plan for thorium compounds as approved by the US EPA.		The thorium repackaging effort for Plant 8 thorium remains on schedule. The Technical Summary of Plant 8 thorium repackaging was transmitted to USEPA on 17-Feb-88. USEPA comments on the summary were issued on 25-Mar-88. Formal responses to the comments will be issued in April, 1988.
2	REMEDIAL INVESTIGATION/INVESTIGATION STUDY		
2.A.	RI/FS work to be conducted in accordance with EPA guidelines.	NA	No Action Required.
2.B.	-- No Action Required --	----	
2.C.	Provide to EPA analysis results for laboratory certification ---- SOW Task 7b.	45 days	Completed.

TABLE 1.

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF 31-Mar-88			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
2.D.	Submit to EPA Work Plan for a complete sitewide RI/FS.	90 days	Work plan transmitted December 19, 1986. Supporting documents were transmitted on January 30, 1987.
2.E	Amend and submit revised RI/FS work plan to EPA if deficiencies are found.		Draft comments received from U.S. EPA on May 14, 1987. Final comments issued from U.S. EPA June 24, 1987. Comment responses and the revised Work Plan Rev. 1 was transmitted to EPA on August 24, 1987. USEPA comments on the Work Plan Rev. 1 were received on December 28, 1987. The Work Plan Rev. 2 was transmitted to USEPA on February 11, 1988. Revision 3 of the Work Plan and supporting documentation was transmitted to USEPA on March 31, 1988. Revision 3 of the Work Plan incorporates all EPA comments received to date and minor consistency changes identified by FMPC personnel.
2.F	Implement tasks detailed in the approved RI/FS Work Plan.		A conditional approval to initiate drilling 45 RI/FS monitoring wells was received from US EPA. Drilling of the wells was initiated on August 25, 1987. The FMPC received approval for installation of remainder of the monitoring wells on February 18, 1988. A total of 62 groundwater monitoring wells were completed as of March 31, 1988.
3	REPORTS AND RECORD KEEPING		
3.B	RI/FS Progress Report		The seventh RI/FS progress report was transmitted to USEPA on March 18, 1988.
CLEAN AIR ACT			
A.	-- No Action Required --	----	
B.1.	Install real-time alarm monitors on all MAJOR emission points. Also list non-alarmed emission points.	30 days	Completed.

TABLE 1.

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF 31-Mar-88			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
B.2.	Establish and implement administrative controls for real-time monitors to ensure any unplanned releases will be detected and dealt with in 24 hours.	30 days	Completed.
B.3.	Establish and implement sample collection and analysis procedures and a QA plan to monitor ALL radionuclide emission points.	30 days	Completed.
B.4.	Establish schedule for the installation and replacement of emission control devices.	30 days	An updated schedule for FY-88 is in final review. Issuance is anticipated in April, 1988.
	Prepare annual progress report on installation and replacement of emission control devices.	annually	Completed. Submitted to USEPA April 4, 1988.
	Respond to U.S. EPA comments on Air Monitoring Network WDF-JAR dated 12-May-87.		In progress. WDF concerns on monitoring station no. 6 addressed in July 14-17, 1987 meeting at the FMPC. Actions to address WDF concerns on FMPC monitoring stations meeting EPA siting criteria to be implemented by May 2, 1988.
C.	Provide annual reports to EPA per 40 CFR 61.94(c)	yearly	The annual report for CY-1986 was transmitted to EPA in 1987. The next annual report is due for transmittal by June 1, 1988.
D.1	Provide EPA yearly stack-testing schedule.	yearly	Completed. The first annual stack testing schedule was transmitted to EPA in December, 1986. A revised schedule was transmitted July 24, 1987. The second schedule was transmitted to DOE November 6, 1987 and transmitted to EPA on December 31, 1987.
D.2	Provide EPA stack-test results for stacks tested that year.	45 days after test analyses completed	Final stack tests were completed in September, 1987. Stack test results for 10 stacks (including particulate radiological results) were submitted to EPA on March 18, 1988.

TABLE 1.

STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
31-Mar-88

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
E.1	Maintain records of monthly particulate matter emissions.	----	Continuing.
E.2	Provide quarterly reports to EPA on these emissions.	quarterly	The initial report was transmitted on December 12, 1986. The second report was issued April 20, 1987. The third report was issued July 29, 1987. The fourth report was issued October 19, 1987. The fifth quarterly report was transmitted to EPA on March 18, 1988.
F.	Provide EPA list of environmental air monitoring equipment, including location and the O&M program.	60 days	Completed.
G.	Develop and provide EPA an O&M program for air pollution control devices.	90 days	Completed.
RCRA			
A.	Achieve compliance with interim status regulations.	30 days	Revisions to the A1-A7 submittals transmitted on January 23, 1987. Additional comments received on May 12, 1987. Response to be transmitted to US EPA following completion of internal review. A Hazardous Waste Analysis Plan was transmitted to USEPA on March 22, 1988.
A.1.	Conduct hazardous waste determination on all waste streams.	30 days	The FMPC Waste Characterization Report was issued to USEPA on March 31, 1988.
A.2.	Commence a hazardous waste analysis program.	30 days	Completed.
A.3.	Update of operating records pursuant to 40 CFR 265.73 and 265.309.	30 days	Completed.
A.4.	Include full name and signature and date received on manifests pursuant to 40 CFR 265.71.	30 days	Completed.
A.5.	Update the facility closure plan to reflect the year the facility expects to begin closure.	30 days	Completed.

TABLE 1.

STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
31-Mar-88

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
A.6.	Begin collection of all run-off from the active portions of pit 4.	30 days	Completed.
A.7.	Prepare and maintain outline for a groundwater quality assessment program.	30 days	Completed.
B.	Submit to EPA for approval a detailed groundwater monitoring plan.	90 days	Complete. Additional comments received from US EPA on May 12, 1987. Response to be transmitted to U.S. EPA following completion of internal review.
B.1.	Determine groundwater flow at the RCRA regulated units.	90 days	Completed.
B.2.	Provide map showing location of all RCRA monitoring wells.	90 days	Completed.
B.3.	Include design and construction specs for all RCRA wells.	90 days	Completed.
B.4.	Monitor for all Appendix VIII constituents, including radionuclides.	90 days	Completed.
B.5.	Include a sampling and analysis plan to meet 40 CFR 265.92.	90 days	Completed
C.1.	Develop a closure plan for the landfill pursuant to 40 CFR 265.112.	60 days	Final closure plan was transmitted to US EPA on July 29, 1987. OEPA granted approval of the closure plan on February 9, 1988.
C.2.	Develop a post-closure plan for the landfill pursuant to 40 CFR 265.118.	60 days	To be developed following RI/FS.
RADIATION DISCHARGE INFORMATION			
A.	Respond to USEPA comments on Items A.1. - A.3. WDF-JAR dated 12-May-87.		In process.
A.1	Provide EPA with existing offsite environmental monitoring program.	30 days	Completed.

TABLE 1.

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF 31-Mar-88			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
A.2	Provide EPA the QA program associated with the environmental monitoring program.	30 days	Completed.
A.3	Report to U.S. EPA, OEPA and Ohio Department of Health the results of the continuous liquid discharge samples.	quarterly	Initial report transmitted on December 12, 1986. Second report transmitted April 20, 1987. Third report transmitted July 29, 1987. Fourth report was transmitted in November. The fifth quarterly report was transmitted to US EPA on March 18, 1988.
REPORTING REQUIREMENTS			
B	Issue monthly progress report of actions taken to ensure compliance with FFCA requirements.	30 days	Aug. 86 issued to US EPA Sep. 86. Sep. 86 issued to US EPA Oct. 86. Oct. 86 issued to US EPA Nov. 86. Nov. 86 issued to US EPA Dec. 86. Dec. 86 issued to US EPA Jan. 87. Jan. 87 issued to US EPA Feb. 87. Feb. 87 issued to US EPA Mar. 87. Mar. 87 issued to US EPA Apr. 87. Apr. 87 issued to US EPA May 87. May 87 issued to US EPA Jun. 87. Jun. 87 issued to US EPA Jul. 87. Jul. 87 issued to US EPA Aug. 87. Aug. 87 issued to US EPA Sep. 87. Sep. 87 issued to US EPA Oct. 87. Oct. 87 issued to US EPA Nov. 87. Nov. 87 issued to US EPA Dec. 87. Dec. 87 issued to US EPA Jan. 88. Jan. 88 issued to US EPA Feb. 88. Feb. 88 issued to US EPA Mar. 88.